DRAFT POLREP No. 5

SITE DESCRIPTION:

Refer to POLREP No. 1 for a discussion of Site conditions and background.

CURRENT ACTIVITIES:

Site removal activities from 07/08/12 through 07/21/12 included:

 Continued excavation of the LNAPL plume and transition areas advancing from east to the west. The bottom of the excavation in the central portion of the plume was approximately 17 feet below ground surface, while the bottom of the excavation in the western portion of the plume was approximately 13 feet below ground surface; both depths EPA determined to be acceptable for the removal of contaminated materials. The soil profile showed varying depths of subsurface contamination (e.g., 0 to 3 feet clean, 3 feet to 6 feet contaminated, 6 feet to 10 feet clean, and 10 feet to 13 feet contaminated), as opposed to the previous soil profile of 0 to 10 feet clean and 10 to 20 feet contaminated. Additionally, the western most boundary of the plume was determined, thus no further excavation on the FHWA ROW is planned beyond the existing boundary (however, not all contaminated material has been removed). Collected four additional post-excavation soil samples from the central and bottom west and east sidewalls of the excavation and submitted the samples for analysis as required by the FHWA 2012 Removal Action Work Plan. No additional samples are anticipated. Depth to groundwater is consistently encountered at approximately 10 feet below ground surface.

Several large subsurface concrete foundations were encountered at the Bentcik/Potlatch property boundary and as a result an excavator with hydraulic breaker attachment was mobilized to the Site to remove the foundations. Residual quantities of petroleum product, principally diesel, was encountered within and surrounding the foundations. Several lengths of approximate 5-inch diameter absorbent boom were found buried several feet below ground surface west of the former boiler house concrete foundation. The absorbent material was visibly stained with petroleum product and a petroleum odor was detected.

• On 07/09/12, the Forest Highway 50 prime construction contractor MDM Construction, Inc. arrived on-Site and began reconstructing the highway. MDM's backfilling activity closely follows EQM's excavation activity. As of 07/20/2012, approximately 11,491 tons of select borrow rock has been delivered and placed. This amount equates to 45 to 60 30-ton trucks with trailers per day (5 days per week) for a total of 383 trucks to date.

- FHWA ROW: As of 07/20/12, approximately 220 cubic yards (yd³) of asphalt has been transported off-Site for recycling; 13,948 yd³ of clean overburden has been excavated and set aside for reuse, and 11,913 yd³ of contaminated material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.
- FHWA/Bentcik Transition Area: As of 07/20/12, approximately 3938 yd³ of clean overburden has been excavated and set aside for reuse, and 1,064 yd³ of contaminated material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.
- FHWA/Potlatch Transition Area: As of 07/20/12, approximately 1,936 yd³ of clean overburden has been excavated and set aside for reuse, and 969 yd³ of contaminated material has been excavated and placed in the on-Site contaminated soil containment cells pending off-Site disposal.
- As of 07/19/12, approximately 9,090 tons of contaminated materials have been shipped off-Site for disposal at the Waste Management Graham Road Recycling and Disposal Facility, Medical Lake, WA. This quantity of contaminated material equates to 35 to 40 30-ton trucks with trailers per day for a total of 303 trucks to date (which is in addition to the highway reconstruction effort).
- Relocated the 1000-foot temporary bypass roadway on-Site to enable cleanup activities to begin on the Bentcik property and the St. Joe River bank.
- Started removal of clean overburden and riprap from approximately 400 feet of the St. Joe River bank along the Bentcik/IDL and Potlatch/IDL property boundaries in preparation for installation of temporary cofferdam the week of 07/23/12. The temporary dam, which is water-inflated and produced from heavy gauge polyvinyl chloride reinforced with polyester, will be used for water management associated with cleanup activities adjacent to the environmentally sensitive St. Joe River bank. Encountered several large subsurface concrete foundation likely associated with maintenance bays. Several product discharges (i.e., seeps) were observed in and among the riprap along this segment riverbank, and petroleum stained vegetation and sheen was periodically observed along the same river segment. Removed the instream subsurface wooden feature which proved to be only a wooden mat attached to the stream bed by long metal pins.

- Dismantled the temporary stream bypass located on the eastern portion of the plume area because it was no longer needed.
- Ongoing operation of the temporary water treatment system. To date, approximately 4,620,700 gallons of contaminated groundwater has been treated. Of this amount, approximately 3,678,600 gallons has been discharged to the St. Joe River while 942,100 gallons has been used on-Site for dust suppression. Operational (effluent) samples were collected on 07/05/12 and were analyzed for the parameters of concern. None of the required water quality discharge parameters were exceeded. Operational samples will be collected and analyzed for the contaminants of concern on an estimated weekly basis.
 - Ongoing maintenance and evaluation of general construction BMPs.
- Ongoing daily routine air quality monitoring at three varying locations and surface water quality monitoring at three locations. To date, there have been no exceedances of applicable air and surface water regulatory criteria.
- Ongoing daily tailgate safety sessions discussing the project, potential hazards, required safety equipment, spill prevention and control BMPs, and anything else personnel should know. Additionally, a site health and safety audit was conducted by EPA R10 personnel.
- Continued evaluation of functional baseline project accounting and auditing arrangements and requirements for EPA, START, and ERRS due to multiple parties, settlement agreements, and funding mechanisms.
 - Personnel on-Site: EPA 1; START 2; ERRS 22; MDM 3; TrafficCorp 2.

PLANNED REMOVAL ACTIONS:

• Complete excavation of the FS Highway ROW, and continue reconstruction of the highway.

- Installation of temporary cofferdam and begin excavation of contaminated material from the St. Joe River bank.
 - Ongoing off-Site transportation and disposal of contaminated materials.
 - Begin excavation of the Bentcik property.
 - Continue to tweak the water treatment system to ensure it meets the required water quality discharge parameters.
 - Continue to evaluate waste acceptance criteria for decontamination and/or disposal of large subsurface debris such as concrete and boulders, and the effectiveness of the proposed field screening methods to be used to determine the extent of excavation.
 - Ongoing maintenance and evaluation of BMPs.
 - Ongoing routine air quality and surface water quality monitoring.

NEXT STEPS:

The next POLREP will be submitted on or about 4 August 2012, and thereafter on a approximate bi-weekly schedule.

KEY ISSUES:

- Determine the extent of contamination associated with the St. Joe River bank.
- Suspended Friday (07/20/12) afternoon delivery of road building materials due to safety concerns for weekend recreational vehicle traffic along the highway and through the Site.